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March 6, 2018

**VIA ECF**

The Honorable Judge Joseph F. Bianco  
United States District Court Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

**Re: Ahmed v. Frontline Asset Strategies, LLC; Case No: 17-cv-2893**

Dear Judge Bianco,

Plaintiff, Raheel Ahmed, by and through his counsel, respectfully requests that the Court stay discovery in this case until after Your Honor rules on defendants' Motion to Compel scheduled for oral argument on June 4, 2018.

By way of background, in accordance with this Court's Scheduling Order, plaintiff propounded discovery requests on defendants on November 21, 2017. To date, defendants have not responded to plaintiff's discovery requests.

On February 14, 2018, defendants filed a request for a pre-motion conference for leave of court to file a motion to compel arbitration. The parties preceded with the pre-motion conference on February 26, 2018 before Your Honor. Defendants were given leave to file its Motion by March 19, 2018. Plaintiff was given leave to file opposition by April 19, 2018, with defendants' reply being due on April 30, 2018.

Although, plaintiff does not believe that defendants will be successful on their motion to compel arbitration, plaintiff understands the defendants may be unwilling to participate in discovery before this Court while their motion to compel arbitration is pending.

This is plaintiff's first request for a stay of discovery. Plaintiff has conferred with defendants' Counsel about this request to stay. Defendants' Counsel has advised that he consents to the request.

A stay of discovery for the entire case until after Your Honor rules on the pending Motion to Compel will produce the most efficient outcome. Issues concerning the jurisdiction of this will be resolved; the risk of duplicative discovery will be eliminated; and discovery as to

each defendant (the case in its entirety) can proceed on the same track.

Plaintiff respectfully requests that the following pretrial schedule dates contained in the this Court's Order of December 5, 2017 (Dkt # 27) are stayed: (1) March 6, 2018 as the deadline for commencement of motion practice for joinder of additional parties or amendment of pleadings; (2) June 6, 2018 as the deadline for all discovery, inclusive of expert discovery, to be concluded; (3) June 20, 2018 as the deadline for any party to initiate proceedings for a dispositive motion; (4) July 10, 2018 as the final conference before the Honorable Judge Arlene R. Lindsay.

Respectfully submitted,

/s/Tiffany N. Hardy  
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cc: All counsel of record (*via* ECF)